



CASCADE LAND CONSERVANCY

CONSERVING GREAT LANDS
CREATING GREAT COMMUNITIES

The Honorable Dow Constantine
Chair, Growth Management Planning Council
King County Chinook Building
401 5th Ave, Suite 800
Seattle, WA 98104

Chairman Constantine:

In May 2011, CLC provided comments in support of several key policy areas of the draft Countywide Planning Policies (see attached letter dated May 19, 2011). As a general statement, our support continues.

We had requested at that time, however, that GMPC consider one change to draft policy DP-61 (now DP-62) concerning the transfer of development rights in rural areas. We would like to take this opportunity to reiterate our concern with the draft policy, as written, as well as offer a minor revision to the current draft language for GMPC's consideration.

Specifically, CLC believes the currently proposed language in DP-62, 7th bullet, could limit King County's future ability to pursue innovative conservation strategies utilizing TDR as a means of achieving its rural growth management goals. This may have unintended impacts on the potential for conserving wildlife and riparian corridors, farmland, and other rural lands identified by the county as having strategic conservation value.

We do not believe the intent of the proposed language was to limit TDR conservation opportunities and therefore would like to offer a small, but important, technical amendment to the proposed policy. In proposed policy DP-62, 7th bullet, we suggest deleting the words "existing" and "very" so that the sub-policy reads as follows:

DP-62: "Permit ~~existing~~ King County allowance for ~~very~~ limited transfers of development rights within the Rural Area,"

With this change, the Countywide Planning Policies will provide broad guidance which may be articulated in greater specificity in the Comprehensive Plan and County Code, thereby allowing the county greater nimbleness in achieving its growth and conservation goals.

CLC believes the county and the region must continue to generate solutions for addressing potential impacts of planned rural growth to protect the character and ecological functions of these lands. We believe that in some circumstances rural-to-rural TDR may be an important tool, such as in situations where existing development regulations allow land use changes in rural areas. Therefore we urge you to retain the flexibility to utilize this tool within the rural area.

Thank you for your consideration of our request. We appreciate your leadership as County Executive and the leadership of the Growth Management Planning Council in retaining the quality of life envisioned in the *Cascade Agenda*.

Sincerely,



Skip Swenson
Managing Director – Policy Department

cc: GMPC members